FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-7265
ARROWAC FISHERIES, INC.

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST-7265. The Department of Ecology (the Department) is proposing to reissue this permit, which will allow discharge of pretreated seafood process wastewater to the City of Bellingham Post Point Wastewater Treatment Plant (Post Point WWTP). This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities that discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

The fact sheet and draft permit have been reviewed by the Permittee.

GENERAL INFORMATION	
Facility Name and Address	ARROWAC FISHERIES, INC. P.O. Box 4155 207 Harris Street Bellingham, WA 98227
Type of Facility	Seafood Processing
Facility Discharge Location	Latitude: 48° 34' 36" N. Longitude: 122° 30' 15" W.
Treatment Plant Receiving Discharge	City of Bellingham, Post Point WWTP WA-002374-4
Responsible Official or Contact	Mr. R. Anthony Blore, Vice President Production and Plant Manager 360-676-1606

TABLE OF CONTENTS

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

Arrowac Fisheries, Inc., seafood processing facility is located on about 1.7 acres near Bellingham Bay, in the Fairhaven Terminal area. The facility is situated west of the Bellingham Cruise Terminal and east of Maritime Contractors, Inc. on Harris Avenue.

There are three main production areas; the Main Plant that uses about 60% of the total water, the Doghouse which uses about 5% of the water, and Warehouse which uses about 20% of the total water.

Arrowac operates four to fourteen hours a day, five days per week.

INDUSTRIAL PROCESSES

Arrowac receives fresh and frozen dogfish, salmon, halibut, black cod, rockfish and other fin fish. They process whole round fish, gutted fish, and headed and gutted fish into fish fillets, portions, steaks, pieces and miscellaneous specialty items.

The clean-up and process wastewater from the Main Plant north area drains to an auger which separates out large solids and discharges them to a tote. The wastewater flows to a collection tank under the pier which has a float activated submersible pump that pumps the wastewater to a Bauer hydrosieve. The screened solids are put in dumpsters for disposal. The screened wastewater then flows to the Post Point WWTP.

The Main Plant secondary system is located in the south end of the main plant. Wastewater drains to a collection pit on the southeast side of the Main Plant. A collection basket in the drain pit collects large solids from the wastewater. The coarsely screened wastewater then flows to the collection tank under the pier and to the Bauer hydrosieve.

Warehouse #9 drains to the collection tank at the southeast corner of the pier then to the Bauer hydrosieve.

Solids collected on the floors and screens are placed in a special bin for pick-up by a rendering company.

PERMIT STATUS

The previous permit for this facility was issued on June 2, 1995 and expired June 2, 2000. An application for permit renewal was submitted to the Department on February 14, 2000 and accepted by the Department on March 20, 2000. A temporary permit became effective April 14, 2000.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received a partial compliance inspection (without sampling) on May 15, 2000. A complete inspection was conducted January 8, 1997. The facility has submitted the required DMRs and is current with all permit submittal requirements.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge has been summarized from discharge monitoring reports from June 1997 to June 2000. The wastewater discharge is characterized for the following parameters:

Parameter	Average	Range of Values
Maximum flow (gpd)	31,974 gpd	17,909-61,650 gpd
Five-Day Biochemical Oxygen Demand (BOD_5)	1,280 mg/L	210-3,800 mg/L
Total Suspended Solids (TSS)	461 mg/L	40-1,200 mg/L
Oil and Grease	301 mg/L	8-1,400 mg/L
pH (std units)		6.4-8.7

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants on the WWTP (local limits). Wastewater must be treated using all known, available, and reasonable methods of treatment (AKART) and not interfere with the operation of the WWTP.

The minimum requirements to demonstrate compliance with the AKART standard for fish processors were determined in the EPA contract document, *Reassessment of Effluent Limitations Guidelines and New Source Performance Standards for the Canned and Preserved Seafood Processing Point Source Category* (1979), as coarse screening followed by fine mesh screening (20 mesh or finer).

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). Federal categorical limitations specifically applicable to raw material already cleaned and frozen do not exist. There are no pretreatment limitations for new or existing sources discharging to a sanitary sewer system listed in 40 CFR Part 408, for this industry. State regulations under Chapter 173-216 WAC require the use of all known, available, and reasonable methods of treatment (AKART) for all wastewater. The following permit limitations are necessary to satisfy the requirement for AKART:

> All process wastewater including clean-up water, must be screened through course screening followed by fine mesh screen prior to discharge to the Post Point WWTP. Wastewater samples shall be taken after passing through the fine mesh screens.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the Post Point WWTP from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by the Post Point WWTP and codified in ordinance. Applicable limits for this discharge include the following:

The pH must be between 6.0 and 9.0 standard units.

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110). The monitoring location has been identified as after screening and prior to combination with domestic wastestreams, before discharge to the Post Point WWTP system.

The monitoring schedule is detailed in the proposed permit under Special Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

Monitoring for biochemical oxygen demand (BOD), oil and grease and total suspended solids (TSS) is being required to quantify the loading to the Post Point WWTP. The monitoring frequency has increased from quarterly to monthly since the last permit based on the strength and variability of the reported wastewater sampling results in the past three years.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3. are based on the authority to specify any appropriate reporting and record keeping requirements to prevent and control waste discharges [WAC 273-216-110 and 40 CFR 403.12 (e), (g), and (h)].

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S5. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances that cause pass-through or interference; pollutants, which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users, which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters, may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for a term of five (5) years.

REFERENCES FOR TEXT AND APPENDICES

Permit Application submitted February 14, 2000.

EPA contract document, *Reassessment of Effluent Limitations Guidelines and New Source Performance Standards for the Canned and Preserved Seafood Processing Point Source Category* (1979).

WPLCS and Discharge Monitoring Data submitted by Arrowac Fisheries

APPENDICES

APPENDIX A—GLOSSARY

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) [including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA], sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Pass-through— A discharge which exits the POTW into waters of the-State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day; or

b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g., facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Significant Industrial User (SIU)--

1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N; and

2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement [in accordance with 40 CFR 403.8(f)(6)].

   Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

   *The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate, which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic faunas. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.